

REMARKS

Claims 1 and 10 are amended. Claims 1-20 remain in the application for consideration. In view of the following amendments and/or remarks, Applicant respectfully requests that the application be forwarded on to issuance.

Teleconference with Examiner

Applicant and the Examiner conducted a teleconference on May 2, 2006. During the teleconference, Applicant and the Examiner discussed the references cited by the Office and the Office's position with respect to the subject claims. Applicant would like to thank the Examiner for taking the time to conduct the teleconference and for his general suggestions regarding potential amendments to the subject claims.

§ 103 Rejections

Claims 1-20 stand rejected under U.S.C. §103(a) as being unpatentable over U.S. Patent No. 6,639,943 to Radha et al. (hereinafter “Radha”) in view of U.S. Patent No. 6,731,811 to Rose (hereinafter “Rose”).

Claims Rejected over Radha in view of Rose

Claim 1, as amended, recites method of processing media content, the method comprising [added language in bold italics]:

- generating a motion compensated prediction of a region of media content;
- receiving an indication of whether there are first and second quantities of residual samples remaining for refining the prediction,

on a per-region basis, *one or more values associated with one or more picture-level parameters*; and

- adding of the first quantity of residual samples to the prediction to generate a refined prediction value, when so indicated; and
- subtracting the second quantity of residual samples from the refined prediction value to generate a final representation, when so indicated.

In making out the rejection of this claim, the Office argues that Radha discloses all of the subject matter of this claim except for subtracting the second quantity of residual samples from the refined prediction value. For this feature, the Office relies on Rose and argues that its combination with Radha would render the subject matter of this claim obvious. The Office argues that the motivation to combine the teachings of these references would be to “obtain an apparatus that operates more efficiently by being able to take advantage of addition information given to a system.”

Applicant respectfully traverses this rejection and submits that the Office has not established a *prima facie* case of obviousness. First, Applicant submits that the references do not collectively disclose all of the subject matter of this claim. For example, Radha does not disclose “receiving an *indication* of whether there are first and second quantities of residual samples remaining *for refining the prediction, on a per-region basis*” and Rose does not disclose “subtracting the second quantity of residual samples from the refined prediction value *to generate a final representation*, when so indicated”.

Second, as Applicant respectfully submitted in its last response, filed October 25, 2006, the Office’s stated motivation (to improve efficiency) is too general because it could cover almost any alteration contemplated of Radha and

1 does not address *why* this specific proposed modification would have been
2 obvious.

3 Nevertheless, in the interest of advancing prosecution, Applicant has
4 amended this claim to clarify that "*the indication comprises one or more values*
5 *associated with one or more picture-level parameters*". To support this
6 clarification, Applicant directs the Office's attention to the discussion regarding
7 Operational Data Structure(s), starting on page 23 of the subject application and,
8 more specifically, to page 59 of the subject application.

9 In view of the above discussion, the Office has not established a *prima*
10 *facie* case of obviousness. Hence, for at least these reasons, this claim is
11 allowable.

12 **Claims 2-9** depend from claim 1 and are allowable as depending from an
13 allowable base claim. These claims are also allowable for their own recited
14 features which, in combination with those recited in claim 1, are neither disclosed
15 nor suggested in the references of record, either singly or in combination with one
16 another.

17 Additionally, regarding claims 4 and 7, Applicant respectfully submits that
18 the Office's reliance on what the region of content in Radha "could comprise" is
19 misplaced because to establish a *prima facie* case of obviousness, the prior art
20 reference (or references when combined) must teach or suggest all the claim
21 limitations. (*In re Royka*, 490 F.2d 981, 180 USPQ 580 (CCPA 1974)).
22 Furthermore, the Office has not provided any motivation as to **why** an artisan
23 would have utilized a macroblock with respect to the region of content.

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1 **Claim 10, as amended**, recites a medium comprising a plurality of
2 executable instructions which, when executed, implement a decoder of media
3 content to generate a motion compensated prediction of at least a region of media
4 content, to receive an indication of one or more sets of samples of residual
5 information to further refine the prediction, ***wherein the indication comprises one***
6 ***or more values associated with one or more picture-level parameters***, and to add
7 a first set of such samples to the prediction to generate a modified prediction, if
8 indicated, and to subtract a second set of such samples from the modified
9 prediction to generate a final motion compensated prediction of the region, if
10 indicated [added language in bold italics].

11 In making out the rejection of this claim, the Office relies on the same
12 argument that it made with respect to claim 1. Therefore, for the reasons set forth
13 above, applicant respectfully traverses this rejection. Nevertheless, in the interest
14 of advancing prosecution, Applicant has amended this claim to clarify that "***the***
15 ***indication comprises one or more values associated with one or more picture-***
16 ***level parameters***". As noted above, neither Radha nor Rose disclose or suggest
17 this subject matter.

18 Accordingly, in view of the above discussion, the Office has not established
19 a *prima facie* case of obviousness. Hence, for at least these reasons, this claim is
20 allowable.

21 **Claims 11-14** depend from claim 10 and are allowable as depending from
22 an allowable base claim. These claims are also allowable for their own recited
23 features which, in combination with those recited in claim 10, are neither disclosed
24 nor suggested in the references of record, either singly or in combination with one
25 another.

1 Additionally, regarding claim 12, Applicant respectfully submits that the
2 Office's reliance on what the region of content in Radha "could comprise" is
3 misplaced. Furthermore, the Office has not provided any motivation as to **why** an
4 artisan would have utilized a macroblock with respect to the region of content.

5 **Claim 15** recites a computing system comprising:

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- 7 • a decoder application to receive a region of media content and
control generation of decoded media content; and
- 8 • an application program interface (API), communicatively coupling
the decoder application with a hardware accelerator, wherein if the
9 API receives an indication of one or more sets of residual samples,
10 the first set of samples is added to a motion compensated prediction
11 to generate a refinement of a prediction value, when so indicated,
and a second set of samples is subtracted from the refined prediction
value to generate a final representation, when so indicated.

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13 In making out the rejection of this claim, the Office relies on the same
14 argument that it made with respect to claims 1 and 15. In addition, the Office
15 argues that Fig. 10 (blocks 52 and 54) of Radha discloses a hardware accelerator
16 and Column 9 (lines 57-59) discloses an application program interface (API), as
17 claimed.

18 Applicant traverses this rejection and respectfully submits that for all of the
19 reasons set forth above, the Office has failed to establish a *prima facie* case of
20 obviousness. Perhaps more importantly, Column 9 (lines 57-59) of Radha simply
21 does not disclose an "application program interface (API), communicatively
22 coupling the decoder application with a hardware accelerator", as claimed. This is
23 not surprising because blocks 52 and 54, depicted in Fig. 10, do not disclose or
24 suggest a "hardware accelerator", as claimed. Furthermore, even if these blocks
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1 did disclose a “hardware accelerator”, which they do not, they are actually part of
2 the decoder itself. (see Fig. 10 and column 9, lines 64-67 through column 10,
3 lines 1-7).

4 Accordingly, in view of the above discussion, the Office has not established
5 a *prima facie* case of obviousness. Hence, for at least these reasons, this claim is
6 allowable.

7 **Claims 16-20** depend from claim 15 and are allowable as depending from
8 an allowable base claim. These claims are also allowable for their own recited
9 features which, in combination with those recited in claim 15, are neither disclosed
10 nor suggested in the references of record, either singly or in combination with one
11 another.

12 Additionally, regarding claim 18, Applicant respectfully submits that the
13 Office’s reliance on what the region of content in Radha “could comprise” is
14 misplaced. Furthermore, the Office has not provided any motivation as to **why** an
15 artisan would have utilized a macroblock with respect to the region of content.

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17 **Conclusion**

18 All of the claims are in condition for allowance. Accordingly, Applicant
19 requests a Notice of Allowability be issued forthwith. If the Office’s next
20 anticipated action is to be anything other than issuance of a Notice of Allowability,
21 Applicant respectfully requests a telephone call for the purpose of scheduling an
22 interview.

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Respectfully Submitted,

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